## IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

TALITHA KINCADE	)	
BROUGHTON,	)	
,	)	CAFN: 1:22-cv-04229-ELR
Plaintiff,	)	
	)	
V.	)	
	)	
	)	
WALMART, INC.	)	
	)	
	)	
	)	
Defendant.	)	

#### NOTICE OF REMOTE DEPOSITION

YOU ARE HEREBY NOTIFIED that, at 10:00 a.m. on Wednesday, the 18<sup>th</sup> day of January, 2023, the undersigned counsel for Defendant will depose Plaintiff TALITHA KINCADE BROUGHTON remotely, via Zoom Video communications.

This deposition will be taken for the purposes of discovery and crossexamination upon oral examination pursuant to the Georgia Civil Practice Act before an officer duly authorized by law to administer oaths. The oral examination will continue until completed.

Respectfully submitted on this the 29th day of December, 2022.

# WALDON ADELMAN CASTILLA HIESTAND & PROUT

/s/ Casey J. Brown
Jonathan M. Adelman
Georgia Bar No. 005128
Casey J. Brown
Georgia Bar No. 757384
Attorneys for Defendant Walmart,
Inc.

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### **CERTIFICATE OF SERVICE**

This is to certify that, on this the 29<sup>th</sup> day of December, 2022, I have served all Parties through their counsel of record with the foregoing *Notice of Remote Deposition* by electronic correspondence and/or by depositing copies of same in the United States Mail in an envelope with sufficient postage thereon addressed, as follows:

Christopher S. Harris Georgia Bar No. 135243 Harris & Harris, LLC 16 Eastbrook Bend Suite 101 Peachtree City, GA 30269 harrisandharrislaw@gmail.com

### WALDON ADELMAN CASTILLA HIESTAND & PROUT

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